

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ANGELE A. OZOEMELAM,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 07-804 (SLR/LPS)
	)	
DELAWARE STATE UNIVERSITY,	)	
an institution of higher education and	)	<b>PUBLIC VERSION</b>
corporate body; ALLEN L. SESSOMS,	)	
individually and in his official capacity	)	
and as President of Delaware State	)	
University; MARK FARLEY, individually	)	
and in his official capacity as Vice President	)	
for Human Resources and Legislative	)	
Affairs of Delaware State University;	)	
and DONALD HENRY, individually and	)	
in his official capacity as Vice President	)	
for Business and Finance of Delaware	)	
State University,	)	
	)	
Defendants.	)	

**DEFENDANTS' REPLY BRIEF IN FURTHER SUPPORT OF THEIR  
MOTION TO DISQUALIFY PLAINTIFF'S COUNSEL**

POTTER ANDERSON & CORROON LLP  
Kathleen Furey McDonough (#2395)  
Sarah E. DiLuzio (#4085)  
1313 North Market Street  
Hercules Plaza, 6th Floor  
Wilmington, DE 19801  
(302) 984-6000  
[kmcdonough@potteranderson.com](mailto:kmcdonough@potteranderson.com)  
[sdiluzio@potteranderson.com](mailto:sdiluzio@potteranderson.com)

*Attorneys for Defendants  
Delaware State University, Allen Sessoms,  
Mark Farley and Donald Henry*

Dated: February 29, 2008  
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**TABLE OF CONTENTS**

	<b><u>PAGE</u></b>
TABLE OF AUTHORITIES .....	ii
ARGUMENT .....	1
I. <b>REDACTED</b> .....	1
A. <b>REDACTED</b> .....	1
B. <b>REDACTED</b> .....	3
II. <b>REDACTED</b> .....	5
III. <b>REDACTED</b> .....	7
CONCLUSION .....	8

# **TABLE OF AUTHORITIES**

<b><u>CASES</u></b>	<b><u>PAGES</u></b>
<i>Conley v. Chaffinch</i> , 431 F. Supp.2d 494 (D. Del. 2006).....	3, 5, 6
<i>Delaware State College v. Ricks</i> , 449 U.S. 250 (1980) .....	1
<i>McKay v. Delaware State Univ.</i> , 2000 U.S. Dist. Lexis 14653 (D. Del. 2000).....	4
<i>Ricks v. Delaware State College</i> , 1978 U.S. Dist. LEXIS 15789 (D. Del. Oct.16, 1978) .....	2
<i>Satellite Fin. Planning Corp. v. First Nat'l Bank of Wilmington</i> , 652 F. Supp. 1281 (D. Del. 1987).....	4
 <b>OTHER AUTHORITIES</b>	
Local Rule 83.6(d) .....	3
Rule 1.9 .....	5, 8
Rule 1.10 .....	5

**ARGUMENT**

- I. REDACTED IN ITS ENTIRETY**
  - A. REDACTED IN ITS ENTIRETY**
  - B. REDACTED IN ITS ENTIRETY**
- II. REDACTED IN ITS ENTIRETY**
- III. REDACTED IN ITS ENTIRETY**

**CONCLUSION**

Based on the forgoing, as well as the arguments set forth in Defendants' opening brief, Defendants Delaware State University and the Individual Defendants respectfully request that the Court disqualify and order the withdrawal of the law firm of Schmittinger & Rodriguez, P. A. and the individual attorneys involved from representation of plaintiff Angele Ozoemelum from all further proceedings in this action.

Respectfully submitted,  
POTTER ANDERSON & CORROON LLP

By: /s/ Sarah E. DiLuzio  
Kathleen Furey McDonough (#2395)  
Sarah E. DiLuzio (#4085)  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
P.O. Box 951  
Wilmington, Delaware 19801  
(302) 984-6000

Attorneys for Defendants  
Delaware State University, Allen Sessoms,  
Mark Farley and Donald Henry

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**CERTIFICATE OF SERVICE**

I hereby certify this 6th day of March, 2008 that the foregoing was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following counsel of record that the document is available for viewing and downloading from CM/ECF:

Noel E. Primos, Esquire  
Schmittinger & Rodriguez, P.A.  
414 S State Street  
P.O. Box 497  
Dover, Delaware 19903

/s/ Sarah E. DiLuzio  
Sarah E. DiLuzio (#4085)  
POTTER ANDERSON & CORROON LLP  
1313 North Market Street  
Hercules Plaza, 6th Floor  
Wilmington, DE 19801  
(302) 984-6000  
sdiluzio@potteranderson.com

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Defendants. )

**PUBLIC VERSION**

**SUPPLEMENTAL AFFIDAVIT OF MARK FARLEY  
IN SUPPORT OF DEFENDANTS' MOTION TO DISQUALIFY**

Dated: February 29, 2008

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## EXHIBIT A



REDACTED IN ITS ENTIRETY

## EXHIBIT B

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## EXHIBIT C

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## EXHIBIT D

REDACTED IN ITS ENTIRETY

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/s/ Sarah E. DiLuzio  
Sarah E. DiLuzio (#4085)  
POTTER ANDERSON & CORROON LLP  
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Wilmington, DE 19801  
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